NA:AAS/KMT F. # 2015R01878

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

SUPERSEDING INFORMATION

- against -

Cr. No. 16-096 (S-1) (BMC)

EDUARDO CORNEJO,

(T. 18, U.S.C., §§ 1594(c), 1594(d) and 3551

et seq.; T. 21, U.S.C., § 853(p))

Defendant.

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### THE UNITED STATES ATTORNEY CHARGES:

### CONSPIRACY TO ENGAGE IN SEX TRAFFICKING OF A CHILD

1. In or about and between September 2014 and November 2015, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant EDUARDO CORNEJO, together with others, did knowingly and intentionally conspire to recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, to wit: Jane Doe, an individual whose identity is known to the United States Attorney, in and affecting interstate commerce, and to benefit, financially and by receiving things of value, from participation in a venture that engaged in such acts, knowing, and in reckless disregard of the fact, that Jane Doe had not attained the age of 18 years and would be caused to engage in one or more commercial sex acts, contrary to Title 18, United States Code, Sections 1591(a)(1) and 1591(a)(2).

(Title 18, United States Code, Sections 1594(c) and 3551 et seq.)

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- 2. The United States hereby gives notice to the defendant EDUARDO CORNEJO that, upon his conviction of the offense charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 1594(d), which requires the forfeiture of any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such offense, and any property, real or personal, constituting or derived from proceeds obtained, directly or indirectly, as a result of such offense.
- 3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:
  - (a) cannot be located upon the exercise of due diligence;
  - (b) has been transferred or sold to, or deposited with, a third party;
  - (c) has been placed beyond the jurisdiction of the court;
  - (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 1594(d); Title 21, United States Code, Section 853(p))

ROBERT L. CAPERS UNITED STATES ATTORNEY EASTERN DISTRICT OF NEW YORK 3

ACTING UNITED STATES ATTORNEY

F. #2015R01817 FORM DBD-34 JUN. 85

No.

# UNITED STATES DISTRICT COURT

### EASTERN District of NEW YORK

### CRIMINAL DIVISION

## THE UNITED STATES OF AMERICA

7.5

EDUARDO CORNEJO,

Defendant.

# SUPERSEDING INFORMATION

(T. 18, U.S.C., §§ 1594(c), 1594(d) and 3551 et seq.; T. 21, U.S.C. § 853(p))

| A true bill.  Filed in open court this |
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Kevin Trowel, Assistant U.S. Attorney (718) 254-6351